

**MEMO ENDORSED.****THE CITY OF NEW YORK  
LAW DEPARTMENT**

**MURIEL GOODE-TRUFANT**  
*Acting Corporation Counsel*

100 CHURCH STREET  
NEW YORK, NY 10007

**ZACHARY T. ELLIS**  
*Assistant Corporation Counsel*  
Labor and Employment Law Division  
(212) 356-0839  
zellis@law.nyc.gov

November 21, 2024

**Via CM/ECF**

Honorable Ona T. Wang  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street, Courtroom 20D  
New York, New York 10007

Re: *Brown v. New York City Department of Education*  
Civil Action No. 1:20-CV-02424-VEC-OTW  
Law Dep't File No. 2020-038133

Dear Judge Wang:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, representing Defendant, the New York City Department of Education (“DOE”), in the above-referenced action. In accord with Your Honor’s Individual Rules of Practice, I write to respectfully request a two-week extension of time for the DOE to file its Motion for Summary Judgment, from November 22, 2024, to December 6, 2024. This is the DOE’s second request for an extension of this deadline. Pro-Se Plaintiff Mary Hurd Brown (“Plaintiff”) consents to the requested extension. In addition, Plaintiff requests that her own deadline to respond to the DOE’s motion for summary judgment be extended until January 31, 2025. The DOE consents to Plaintiff’s extension request.

The extension of time is necessary because of workload issues, including a very high volume of labor- and employment-related litigation in both federal and state court. The requested extension is also necessary to provide my client with time to review the filing, which review will be complicated by the fact that Thanksgiving is next week.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Zachary T. Ellis  
Assistant Corporation Counsel

cc: Pro-Se Plaintiff Mary Hurd Brown (by CM/ECF)

Application **GRANTED**.

Defendant's motion for summary judgment is due **December 6, 2024**. Plaintiff's opposition, if any, is due **January 31, 2025**. Defendant's reply, if any, is due **February 14, 2024**.

There will be no further extensions to the briefing schedule.

**SO ORDERED.**



---

Ona T. Wang  
U.S.M.J. 11/22/2024